

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PAULA DISBERRY

Plaintiff,

v.

EMPLOYEE RELATIONS COMMITTEE OF
THE COLGATE-PALMOLIVE COMPANY,
ALIGHT SOLUTIONS, LLC, AND THE BANK
OF NEW YORK MELLON CORPORATION,

Defendants.

Case No. 22-cv-05778-CM-OTW

DECLARATION OF ANJANIQUE M. WATT

Pursuant to 28 U.S.C. § 1746, Anjanique M. Watt, Esq. hereby declares:

1. I am a member of the Bar of this Court and an associate at the law firm Mayer Brown LLP, counsel for The Bank of New York Mellon (“BNY Mellon”). I respectfully submit this declaration in support of BNY Mellon’s Reply in support of its Motion to Dismiss, dated October 4, 2022.

2. Attached hereto as Exhibit A is a true and complete copy of the Complaint filed on April 3, 2020 in the Northern District of Illinois in the matter styled *Bartnett v. Abbott Laboratories, et al.*, No. 20-cv-02127 (N.D. Ill.).

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 4th day of October, 2022 in New York, New York.

/s/ Anjanique M. Watt
Anjanique M. Watt